

Before The  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the matter of )

)  
Amendment of 47 C.F.R. §1.1200 )  
et seq. Concerning Ex Parte )  
Presentations in Commission )  
Proceedings )

GC Docket No. 95-21

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To: The Commission

COMMENTS OF ADVANCED CORDLESS TECHNOLOGIES, INC.

1. Advanced Cordless Technologies, Inc. (ACT) supports the proposed amendment of 47 C.F.R. §1.1206(d)(2) to require that full details be provided in writing concerning all oral presentations that are the subject of the section dealing with "Permit-but-disclose proceedings."

2. ACT alleges as follows: that the existing language of the regulation, while seemingly clear on its face for well-intended parties, has permitted certain parties, without objection by the Commission or its staff, to make flagrant numbers of oral contacts, not possibly consistent with an innocent course of conduct, while filing written reports that disclosed virtually nothing but docket numbers, on the unbelievable premise that the contacts merely reinforced written presentations previously submitted in some unidentified way, thus facilitating efforts to manipulate the existing regulations in filing written reports as a cover for unlawful lobbying activities. ACT's petition for reconsideration filed with the FCC March 7, 1994 in General Docket No. 90-314; ACT v. FCC, Case No. 95-1003, United States Court of Appeals, D.C. Circuit, filed January 3, 1995; ACT v. FCC and USA, Case No. 95, 1065, United

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States Court of Appeals, D.C. Circuit, filed January 25, 1995;  
ACT v. FCC, et al, 1-94CVP2315, United States District Court,  
D.C., complaint dismissed February 27, 1995, notice of appeal to  
the United States Court of Appeals, D.C. Circuit, filed March 29,  
1995.

3. While parties intent on doing something of that nature  
can no doubt manipulate the proposed regulations as well, the  
requirement that all written reports of oral contacts must  
disclose all aspects of the oral prsentation will at least make  
such an unlawful exercise more difficult to carry out.

Respectfully submitted,



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Gene A. Bechtel

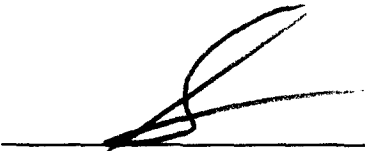
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April 13, 1995

CERTIFICATE OF SERVICE

I certify that copies of the foregoing COMMENTS OF ADVANCED CORDLESS TECHNOLOGIES, INC. are being forwarded by first class United States mail, postage prepaid, on this 13th day of April 1995 to the parties on the attached list.



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